

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

v.

JOHN M. FIFE, CHICAGO VENTURE
PARTNERS, L.P., ILIAD RESEARCH AND
TRADING, L.P., ST. GEORGE
INVESTMENTS LLC, TONAQUINT, INC.,
AND TYPENEX CO-INVESTMENT, LLC,

Defendants.

Civil Action No. 1:20-cv-05227

Honorable Nancy L. Maldonado
Honorable Heather K. McShain

JOINT STATUS REPORT

Pursuant to the Court’s October 20, 2023 Order (“Order”) (*see* Dkt No.139), Plaintiff United States Securities and Exchange Commission (“SEC”) and Defendants John M. Fife (“Fife”), Chicago Venture Partners, L.P., Iliad Research and Trading, L.P., St. George Investments LLC, Tonaquint, Inc., and Typenex Co-Investment, LLC (collectively, “Defendants,” and, together with the SEC, “the Parties”), respectfully submit this Joint Status Report. The Parties state as follows:

A. Status of Outstanding Fact Discovery

On October 30, 2023, Defendants filed their response (*see* Dkt No.140) in opposition to the SEC’s Motion to Compel Discovery. On November 3, 2023, the SEC filed its response (*see* Dkt No.143) in opposition to Defendants’ Second Motion to Compel. On November 8, 2023, Defendants filed a Notice of Supplemental Authority (*see* Dkt No.145) regarding Defendants’ Second Motion to Compel.

The Parties are in the process of scheduling mutually acceptable dates for the depositions of Fife and two current or former employees of Defendants. Additionally, the Parties are in the process of scheduling a mutually acceptable date for the deposition of a third-party individual whom the SEC believes was involved in Defendants' convertible debt transactions, and the SEC may schedule additional depositions of 1-3 other such individuals. Defendants intend to shortly serve certain additional discovery requests.

B. Statement Regarding Settlement Discussions

There have been no recent discussions of a settlement. The Parties do not request a settlement conference at this time.

C. Other Matters

There are no other matters that the Parties wish to bring to the Court's attention at this time.

DATED: November 20, 2023

/s/ Eric M. Phillips

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Counsel for Defendants

** Pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on the 20th day of November, 2023, I electronically filed a copy of the foregoing Joint Status Report through the Court's CM/ECF System, which will send notifications of the filing to all counsel of record.

/s/ Eric M. Phillips